

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

INTELLECTUAL VENTURES I LLC and)	
INTELLECTUAL VENTURES II LLC,)	
)	
<i>Plaintiffs,</i>)	C.A. No. 4:24-cv-00980-ALM
)	
v.)	
)	JURY TRIAL DEMANDED
AMERICAN AIRLINES, INC.)	
)	
<i>Defendant.</i>)	

**DECLARATION OF JONATHAN WALDROP IN SUPPORT OF
PLAINTIFFS’ OPPOSITION TO MOTION TO STRIKE THE ALLEGEDLY
UNTIMELY EXPERT DECLARATIONS BY AMERICAN AIRLINES, INC.**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz LLP. I am one of the attorneys responsible for the representation of Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (“Plaintiffs”) in this matter and make this declaration in support of Plaintiffs’ Opposition to Motion to Strike the Allegedly Untimely Expert Declarations by American Airlines, Inc.

2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

3. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs’ Identification of Proposed Construction, dated July 14, 2025.

4. Attached hereto as Exhibit 2 is a true and correct copy of an email from John Downing to Casey L. Shomaker, dated August 4, 2025.

5. Attached hereto as Exhibit 3 is a true and correct copy of an email from Casey L. Shomaker to John Downing, dated August 4, 2025.

6. Attached hereto as Exhibit 4 is a true and correct copy of an email from John Downing to Casey L. Shomaker dated August 6, 2025.

7. Attached hereto as Exhibit 5 is a true and correct copy of an email from Jonathan H. Hicks to Counsel for American, dated August 28, 2025.

8. Attached hereto as Exhibit 6 is a true and correct copy of an email from Casey L. Shomaker to Jonathan H. Hicks, dated September 2, 2025.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on this 10th day of September, 2025, in Redwood Shores, California.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop